BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268–0001

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POSTAL BATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

MOTION FOR LATE ACCEPTANCE OF OBJECTION OF THE UNITED STATES POSTAL SERVICE TO UNITED PARCEL SERVICE INTERROGATORIES (UPS/USPS-T1-72, 73(b) and (e), and 75(b)(i) and (ii)) (April 25, 2000)

The United States Postal Service hereby moves for late acceptance of Objection of the United States Postal Service to United Parcel Service Interrogatories (UPS/USPS-T1-72, 73(b) and (e), and 75(b)(i) and (ii)). The UPS interrogatories, directed to witness Xie, were filed on April 13, 2000. Objections were thus due on April 24, 2000. The one-day delay in filing was cause by the need to coordinate among various functional groups at Headquarters and the need to obtain estimates of response time and costs from postal computer programmers in St. Louis. The Postal Service regrets any inconvenience, but does not believe anyone will be prejudiced by the brief delay.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Susan M. Duchek

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Susan M. Duchek

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